

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC TARIFF FILING OF BIG RIVERS	)	
ELECTRIC CORPORATION AND KENERGY	)	CASE NO.
CORP. TO IMPLEMENT A NEW STANDBY	)	2021-00289
SERVICE TARIFF	)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION  
TO BIG RIVERS ELECTRIC CORPORATION AND KENERGY CORP.

Big Rivers Electric Corporation (BREC), and Kenergy Corp. (Kenergy), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due no later than February 4, 2022. The Commission directs BREC and Kenergy to the Commission's July 22, 2021, Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

BREC and Kenergy shall make timely amendments to any initial response if BREC or Kenergy obtain the information that indicates the response was incorrect when made or, though correct when made, is now inaccurate in any material respect. For any request to which BREC and Kenergy fail or refuse to furnish all or part of the requested information, BREC and Kenergy shall provide a written explanation of the specific grounds for its failure to respond entirely and precisely.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, BREC and Kenergy shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to BREC's Standard Rate QFS Cogeneration/Small Power Production Sales Tariff Over 100 kW, Sheet No. 40-47(QFS Tariff); the direct testimony of Justin Bieber (Bieber Direct Testimony), pages 14–16; and BREC and Kenergy's response to Staff's First Request for Information (Response to Staff's First Request), Item 3.

- a. Provide a numerical billing example of an industrial customer using the same set of facts contained in BREC's Response to Staff's First Request, Item 3, but calculated using the QFS Tariff.

b. Provide a numerical billing example of an industrial customer using the same set of facts contained in BREC's Response to Staff's First Request, Item 3, but calculated using Table JB-2 contained in Bieber Direct Testimony, page 15.

c. Provide a numerical billing example using the same set of facts contained in BREC's Response to Staff's First Request, Item 3, but calculated using Table JB-3 contained in Bieber Direct Testimony, page 16.

2. Provide the calculation BREC used in determining the avoided transmission capacity value to include in its proposed demand rate for Maintenance/Backup Power as presented in this proceeding.

3. If BREC did not calculate or include avoided transmission capacity value in its proposed demand rate for Maintenance/Backup Power as presented in this proceeding, provide the Calculation BREC uses to determine avoided transmission capacity generally.

4. The intent of both the QFS Tariff and the LICSS Tariff are to provide to Supplemental, Maintenance, and Backup Power Service, and the only difference in whether a Standby customer can take service under QFS or LICSS is the size of its generator. All else being equal, explain the differences in cost to supply Supplemental, Maintenance, and Backup Service between the two Tariffs that necessitate the differing rate structures.



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DATED JAN 24 2022

cc: Parties of Record

Case No. 2021-00289

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